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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

3100 Port of Benton Blvd • Richland, WA 99354 • (509) 372-7950

October 15, 2007

Ms. Shirley J. Olinger, Acting Manager
Office of River Protection
United States Department of Energy
P.O. Box 450, MSIN: H6-60
Richland, Washington 99352

Mr. William S. Elkins, Project Director
Bechtel National, Inc.
2435 Stevens Center Place, MSIN: H4-02
Richland, Washington 99354

Re: Submittal of Hanford Facility RCRA Permit Modification Notification Form
24590-LAW-PCN-ENV-07-006; Class ¹1 Modification to the Hanford Facility Dangerous
Waste and Resource Conservation and Recovery Act (RCRA) Permit for the Treatment,
Storage, and Disposal of Dangerous Waste, Part III, Operating Unit 10
(Waste Treatment and Immobilization Plant), WA7890008967

0074006

Dear Ms. Olinger and Mr. Elkins:

The Department of Ecology approves the referenced Class ¹1 Modification submitted
September 26, 2007. The approved Hanford Facility RCRA Permit Modification Notification
Form is enclosed.

Modification 24590-LAW-PCN-ENV-07-006 provides the updated Independent Qualified
Registered Professional Engineer assessment (AREVA-IA-101, Revision 0) for the Low Activity
Waste Secondary Offgas/Vessel Vent Process System, Caustic Collection Tank
(LVP-TK-00001).

If there are any questions, contact me at 509-372-7882 or Tracy Gao at 509-372-7901.

Sincerely,

Brenda Becker-Khaleel
WTP Permit Writer
Nuclear Waste Program

aah/jc
Enclosure

cc: See next page

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Ms. Olinger and Mr. Elkins
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cc electronic w/enc:

John Eschenberg, USDOE
Lori Huffman, USDOE
Tony McKarns, USDOE
Gae Neath, USDOE
Don Sommer, USDOE
William Taylor, USDOE
Brad Erlandson, BNI
Peggy Fisher, BNI
Stan Hill, BNI
Dennis Klein, BNI
Sandi Murdock, BN
Suzette Thompson, FHI
Phil Peistrup, WGI

cc w/enc:

H-0-8
Administrative Record: Tank Waste Treatment Requirements ✓
Environmental Portal
USDOE-ORP Correspondence Control

Quarter Ending September 30,
2007


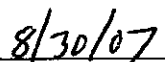
24590-LAW-PCN-ENV-07-006

Hanford Facility RCRA Permit Modification Notification Form**Part III, Operating Unit 10****Waste Treatment and Immobilization Plant**

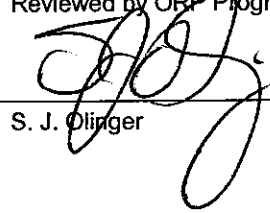
Index

Page 2 of 2: Hanford Facility RCRA Permit, Part III, Operating Unit 10, Waste Treatment and Immobilization Plant
Update the integrity assessment for the LAW Secondary Off-gas/Vessel Vent Process (LVP) System, Caustic Collection Tank (LVP-TK-00001), located in room L-0218, at Elevation 28'-0" of the LAW Vitrification Building in Appendix 9.11 of the Dangerous Waste Permit.

Submitted by Co-Operator:


D. A. Klein
8/30/07
Date

Reviewed by ORP Program Office:


S. J. Dlinger
9/26/07
Date

Quarter Ending September 30,
2007

24590-LAW-PCN-ENV-07-006

Hanford Facility RCRA Permit Modification Notification Form												
Unit: Waste Treatment and Immobilization Plant		Permit Part & Chapter: Part III, Operating Unit 10										
Description of Modification: The purpose of this Class 1 prime modification is to update the Integrity Assessment of the LAW Secondary Off-gas/Vessel Vent Process (LVP) System, Caustic Collection Tank (LVP-TK-00001), located in room L-0218, at Elevation 28'-0" of the LAW Vitrification Building. The following document is submitted to replace the document currently in Appendix 9.11.												
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td colspan="4" style="padding: 2px;">Appendix 9.11</td> </tr> <tr> <td style="width: 15%; padding: 2px;">Replace:</td> <td style="width: 40%; padding: 2px;">24590-CM-HC4-HXYG-00138-02-00038, Rev. 0</td> <td style="width: 15%; padding: 2px;">With:</td> <td style="width: 30%; padding: 2px;">AREVA-IA-101, Rev.0</td> </tr> </table>					Appendix 9.11				Replace:	24590-CM-HC4-HXYG-00138-02-00038, Rev. 0	With:	AREVA-IA-101, Rev.0
Appendix 9.11												
Replace:	24590-CM-HC4-HXYG-00138-02-00038, Rev. 0	With:	AREVA-IA-101, Rev.0									
This modification requests Ecology approval and incorporation into the permit the above mentioned integrity assessment report. The report has been updated by the Independent Qualified Registered Professional Engineer (IQRPE). The report reflects the IQRPE's review of the following final design documents: <ul style="list-style-type: none"> • Mechanical Data Sheet, Facility and Vendor Fabrication Drawings, Specifications, and Material Requisitions produced in accordance with the following Reference: <ul style="list-style-type: none"> ◦ API-650 Standard, American Petroleum Institute, Welded Steel Tanks for Oil Storage • 24590-CM-POA-MVA0-00019-02-00002, Rev. 00C, Design Calculations for LAW Caustic Collection Tank (LVP-TK-00001) • 24590-WTP-DB-ENG-01-001, Rev. 1I, Basis of Design • 24590-LAW-N1D-LVP-00002, Rev. 2, Corrosion Evaluation - Caustic Collection Tank LVP-TK-00001 (LAW) • 24590-WTP-PER-PR-03-002, Rev. 2, Toxic Vapors and Emissions from WTP Tank Systems and Miscellaneous Treatment Unit Systems; • 24590-WTP-PER-PR-03-001, Rev. 1, Prevention of Hydrogen Accumulation in WTP Tank Systems and Miscellaneous Treatment Unit Systems. 												
For each item of "Information Assessed" in the integrity assessment report, the items listed under the "Source of Information" column were reviewed and found to furnish adequate design controls and requirements to ensure the design fully satisfies the requirements of Washington Administrative Code, WAC-173-303-640; <i>Dangerous Waste Regulations for Tank Systems</i> .												
WAC 173-303-830 Modification Class: ^{1 2}		Class 1	Class ¹ 1	Class 2	Class 3							
Please mark the Modification Class:			X									
Enter Relevant WAC 173-303-830, Appendix I Modification citation number: NA Enter wording of WAC 173-303-830, Appendix I Modification citation: In accordance with WAC 173-303-830(4)(d)(i), this modification notification is requested to be reviewed and approved as a Class ¹ 1 modification. WAC 173-303-830(4)(d)(ii)(A) states, "Class 1 modifications apply to minor changes that keep the permit current with routine changes to facility or its operation. These changes do not substantially alter the permit conditions or reduce the capacity of the facility to protect human health or the environment. In the case of Class 1 modifications, the director may require prior approval."												
Modification Approved: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (state reason for denial) Reason for denial:			Reviewed by Ecology: <div style="display: flex; justify-content: space-between; align-items: center;"> <div style="text-align: center;"> B. Becker-Khaleel </div> <div style="text-align: center;"> 10/15/07 Date </div> </div>									

¹ Class 1 modifications requiring prior Agency approval.

² If the proposed modification does not match any modification listed in WAC 173-303-830 Appendix I, then the proposed modification should automatically be given a Class 3 status. This status may be maintained by the Department of Ecology, or down graded to a Class '1, if applicable.